(3)

No. 90-419

In The

Supreme Court of the United States

October Term, 1990

JOHN DOE,

Petitioner,

v.

BOROUGH OF CLIFTON HEIGHTS, et al.,

Respondents.

On Petition For Writ Of Certiorari To The United States Court Of Appeals For The Third Circuit

RESPONDENTS' BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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October 8, 1990

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QUESTIONS PRESENTED

1. Whether 42 U.S.C. §1983, which creates a right of action against "any person" who deprives another or causes another to be deprived of his rights under federal law, makes violations of private rights under a federal funding statute actionable only against recipients of federal funds under that statute.

2. Whether qualified immunity is available in a suit under §1983 to those who violate established state and federal statutory law, simply because they did not think that they would subsequently be held liable for damages under §1983.

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STATEMENT OF THE CASE

a. Procedural Posture

This is a civil rights action for damages only brought in the Eastern District of Pennsylvania pursuant to 42 U.S.C. §1983 ("§1983"). The action arises out of the erroneous, adult commitment of Petitioner John Doe ("Petitioner"), to an adult county prison for approximately 56 hours. In fact, Petitioner was 17 years and 7 months at the time of the events in question. In this action, Petitioner has made only federal claims; he has not raised any state claim at any stage of this proceeding. No pendent jurisdiction has been alleged. See Complaint, paragraph 2, App. p.37.

In the District Court, Petitioner pursued claims based upon alleged violations of substantive and procedural due process, upon alleged "deliberate indifference" to the safety of Petitioner, and upon an alleged violation of the Juvenile Justice and Delinquency Prevention Act of 1974, 42 U.S.C. §5601, et seq. ("JJDPA"). In this Court, Petitioner pursues only the JJDPA claim and the question of immunity arising from the alleged violation of that Act.

Two groups of defendants are involved in this civil action. The first group is composed of the Borough of Clifton Height, the Pennsylvania municipality where the arrest and adult commitment of Petitioner occurred, and the participating police officers, Police Corporal Robert Keates, Police Officer Zimath, and Richard Roe #1 (collectively "Police Respondents"). The second group was originally designated as the "Delaware County Prison and Richard Roe #2, guards and/or employees of Delaware

County Prison." See Caption of Complaint, App. p.37. As evident from this designation, at the commencement of this action, there was no viable defendant before the District Court from the "second group." The "Delaware County Prison" ("Respondent Prison") is a descriptive term, is not a legal entity under state law, and, it was contended, not a "person" within the meaning of §1983. Similarly, "Richard Roe #2" was by definition not a named individual defendant.

In any event, to correct these omissions, the Delaware County Prison Board a/k/a Board of Prison Inspectors of Delaware County ("Respondent Prison Board") was added as a party defendant by Order dated July 12, 1989. See Civil Docket entries, App. p.4. Further, Warden Kenneth Matty ("Respondent Warden") and Correctional Officer David W. Jones ("Respondent Correctional Officer") were also added as parties defendant by Order dated September 13, 1990. See Civil Docket entries, App. p.5. Respondent Correctional Officer was "on duty" in the Intake Unit the night of the alleged sexual assault. This Brief in Opposition is filed on behalf of Respondents Prison, Prison Board, Warden and Correctional Officer (collectively, "Prison Respondents").

In the District Court, both the Police Respondents and Prison Respondents filed Motions for Summary Judgment. The Motion of Prison Respondents was based upon (1) the absence of any actionable "policy" under *Monell v. N.Y. City Dept. of Soc. Services*, 436 U.S. 658 (1978); (2) the absence of any constitutional due process claim under *Baker v. McCollan*, 443 U.S. 137 (1987) and

Hewitt v. Helms, 459 U.S. 460 (1983); (3) the absence of any "deliberate indifference" under *Daniels v. Williams*, 474 U.S. 327 (1986) and *Davidson v. Cannon*, 474 U.S. 344 (1986); (4) "absolute immunity" under *Lockhart v. Hoenstein*, 411 F.2d 455 (3rd Cir.) cert. den. 396 U.S. 941 (1969); and (5) "good faith" immunity under *Harlow v. Fitzgerald*, 457 U.S. 800 (1982).

By Order dated September 13, 1989, the District Court granted both Motions for Summary Judgment. In its Memorandum supporting the Order granting Summary Judgment, see Petition for Writ of Certiorari, A-1 to A-11, the District Court expressly and by implication accepted the arguments as to Prison Respondents concerning the absence of an actionable policy, the absence of any due process violation, the absence of deliberate indifference, and the applicability of "good faith" immunity.

The District Court rejected the argument of Petitioner based upon the Juvenile Justice and Delinquency Prevention Act of 1974, 42 U.S.C. §5601, et seq. ("JJDPA"), primarily on the basis of an absence of any policy of violating that Act. Further, while the District Court did accept the argument of Petitioner that a §1983 cause of action was available to enforce rights under the JJDPA, the District Court rejected such a claim against all Respondents because " . . . Congress intended to provide a private right of action only against state and/or local agencies eligible for funding under the Act." See Memorandum of District Court in Petition for Writ of Certiorari, A-10.

From this Order of the District Court, Petitioner filed a timely Notice of Appeal to the Court of Appeals for the

Third Circuit. After oral argument on April 4, 1990, which affirmed the summary judgment granted by the District Court. See Petition for Writ of Certiorari, A-12 and A-13. By implication, the Court of Appeals had rejected the argument of Petitioner based upon the JJDPA. Thereafter, Petitioner filed a timely Petition for Rehearing which Petition was denied by the Court of Appeals by Order of June 7, 1990. See Petition for Writ of Certiorari, A-14 and A-15. On September 4, 1990, Petitioner filed his Petition for a Writ of Certiorari with the Supreme Court.

b. Counterstatement of Facts

Petitioner misstates the "crucial facts" that were the basis of the summary judgment in this civil action. First, as to the Prison Respondents, the Petitioner was not considered "a juvenile at the time of the events in question." On the contrary, the Petitioner was considered an adult commitment who was claiming to be a juvenile. Second, also as to Prison Respondents, the Petitioner was not a juvenile "sent to an adult prison, where he was celled with adult offenders." On the contrary, again, Petitioner was considered an adult commitment who was sent to an adult prison where he claimed to be a juvenile. Pending verification of this claim, Petitioner was celled with adult inmates. And finally, at no time in these proceedings, have Prison Respondents ever conceded that their treatment of Petitioner was in violation of either state or federal law. In fact, as earlier stated, Petitioner never raised or pursued below any state law claim. With respect to federal law, in the view of Prison Respondents, the JJDPA simply does not address the question of an

erroneous commitment. On the contrary, as noted by the District Court in its Memorandum, this case was nothing more than an "isolated incident" involving the erroneous commitment of a juvenile, as an adult, to an adult prison.

Significantly, the adult commitment of Petitioner was due in material part to misinformation provided by him to Respondent Police Officer Robert Keates ("Respondent Keates"). At the police station, Petitioner advised Respondent Keates that he had a valid Pennsylvania driver's license. See Dep. Trans. of Respondent Keates, App. pp.94-101. This information was false, but was used by Respondent Keates to identify Petitioner as an adult. See Dep. Trans. of Respondent Keates, App. p.106. In any event, both the District Court and the Court of Appeals agreed that the conduct of Respondent Keates in identifying Petitioner as an adult was "negligence" only and not actionable under §1983. See *Daniels v. Williams*, supra; *Davidson v. Cannon*, supra. Petitioner has not challenged in this Petition for a Writ of Certiorari this legal conclusion of the District Court which was affirmed by implication by the Court of Appeals.

Petitioner John Doe was incarcerated at the Delaware County Prison pursuant to a facially valid, adult commitment order of District Justice John Perfetti. See Exhibit #3 to Affidavit of Respondent Warden, Supp. App. p.221. Petitioner has not challenged the sufficiency or adequacy of the "process" which resulted in the issuance of this order. See *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1987). Petitioner never sued the Bail Agency which approved adult bail for Petitioner or the District Justice who committed Petitioner. Under Pennsylvania law, a

District Justice is prohibited from so committing a known juvenile, 42 Pa. C.S.A. §6303(b).

Petitioner was committed to the Delaware County Prison at approximately 12:10 p.m., Saturday afternoon, November 14, 1987. See Exhibit #2 to Deposition of Petitioner, App. p.33, and Dep. Trans. of Correctional Officer Michael Pelleriti, App. p.127. At commitment, Petitioner had no identification on his person. See Dep. Trans. of Petitioner, App. p.168; Dep. Trans. of Michael Pelleriti, App. p.131. Upon commitment, Petitioner had an "intake interview" with Correctional Officer Pelleriti during which he claimed to be a juvenile. See again Exhibit #2 to Deposition of Petitioner, App. p.33. In response to this information, Correctional Officer Pelleriti gave Petitioner the opportunity to substantiate his claim by contacting anyone he wished by phone. See Dep. Trans. of Michael Pelleriti, App. pp.128-132. Petitioner has admitted that he attempted three times that afternoon to phone his family. See Dep. Trans. of Petitioner, App. pp.168-170, 173. Although Petitioner claims to have attempted to reach his grandmother, she has testified she is "sure" she was home all day Saturday. See Dep. Trans. Birdie Whyche, Supp. App. p.224.

In any event, in the early evening of Saturday, November 14, 1987, Petitioner was transferred upstairs in the Intake Unit to a multi-man cell, Cell #6. Petitioner was placed in Cell #6 because other individuals housed therein had basically similar charges. See Dep. Trans. of Michael Pelleriti, App. pp.119-124; Answer of Prison Respondents to Interrogatory #2, Supp. App. p.198. The other inmates in Cell #6 were adults. See names and ages in Answer of Prison Respondents to Interrogatory #3,

Supp. App. p.198. Petitioner has admitted that he did not feel threatened by any of his cellmates, that these cellmates never threatened or hit him, and that no cellmate was involved in the alleged sexual assault. See Dep. Trans. of Petitioner, App. pp.171-172. Multi-man cells are used in the Intake Unit for safety reasons. See Affidavit of Respondent Warden, paras. 7 and 8, Supp. App. pp.208-209.

On Sunday, November 15, 1987, Petitioner has testified that he did not request to make any phone calls although a guard was available to ask. See Dep. Trans. of Petitioner, App. pp.173-174. On Monday morning, November 16, 1987, during his interview with Intake Counsellor Eugene Farina, Petitioner was able to contact his grandmother by phone. See Dep. Trans. of Petitioner, App. pp.174-175 and Dep. Trans. of Eugene Farina, App. pp.143-145. His grandmother was able to substantiate his claim to proper authorities and he was released to the Juvenile Detention Center – a separate facility in another location – in the early evening of November 16, 1987.

As a matter of policy and state law, juveniles – except those charged with murder or certified as adults – are not committed to the Delaware County Prison. See 41 Pa. C.S.A. §6327. With respect to adult commitments who claim to be juveniles – such as Petitioner – the procedures followed by Correctional Officer Michael Pelleriti and Intake Coordinator Eugene Farina complied with prison policy. This policy and its justification are explained in depth by Respondent Warden in his Affidavit, paras. 5 through 9. See Supp. App. pp.205-210. The Petitioner has not requested review of the question whether this policy violated any 14th Amendment or state law "liberty"

interest, see *Hewitt v. Helms*, 459 U.S. 460 (1983). Rather, Petitioner seeks review of these procedures and policy only as they relate to the JJDPA. For the reasons explained herein, Prison Respondents contend that no reason for certiorari exists and that proper justice has been done by the courts below.

ARGUMENT

a. Summary of Argument

Prison Respondents contend that the rulings of the District Court and the Court of Appeals for the Third Circuit are correct, that they involve no substantial federal question, and that they are consistent with, rather than in conflict with, existing Supreme Court precedents. Prison Respondents contend, therefore, that no reason exists for a Writ of Certiorari to be granted.

Prison Respondents believe that Petitioner has misapprehended from the beginning of this civil action several basic legal principles which are fatal to his cause. First, Petitioner has forgotten the "policy" requirement for municipal liability under §1983. *Monell*, supra; *City of Canton v. Harris*, ___ U.S. ___, 103 L.Ed.2d 412, 109 S.Ct. 1197 (1989). Second, Petitioner has forgotten the theory of potential liability under the Spending Clause, Article I, §8, cl. 1 of the United States Constitution. *Pennhurst State School v. Haldeman*, 451 U.S. 1 (1981); *Guardians Association v. Civil Service Commission of New York City*, 463 U.S. 582 (1983). Third, Petitioner has forgotten the distinction between the existence of a cause of action and the non-

availability of a damages remedy in Spending Clause litigation. *Pennhurst*, ibid.; *Guardians Association*, ibid. Fourth, Petitioner has simply misread the JJDPA. And finally, Petitioner has misunderstood the concept of "good faith" immunity under *Harlow v. Fitzgerald*, supra.

Because the District Court and Court of Appeals have either correctly understood these concepts and applied them to the facts of this case, or have simply failed to address the non-issues which have been raised by Petitioner, Prison Respondents contend that no reason exists for this Petition to be granted.

b. The Absence of a Municipal Policy

Before liability can be imposed upon a "municipal actor", the existence of an actionable "policy or custom" must be present. *Monell*, supra. To be actionable, there must be a direct causal link between the execution of the "policy or custom" and the constitutional violation. *City of Canton*, supra, pp.424 and 427.

In this case, Petitioner has simply failed to show the existence of any "policy or custom" of incarcerating juveniles in the Delaware County Prison. As the District Court noted:

> Here, the record contains no evidence of any municipal policy or custom, formal or informal, of incarcerating juveniles with adult offenders. The experience of John Doe appears to have been an isolated incident.

See Memorandum of District Court in Petition for a Writ of Certiorari, A-4 and A-5.

This conclusion was absolutely correct, involved no novel or substantial federal question, and was consistent with existing Supreme Court precedent. Petitioner was committed erroneously to the Delaware County Prison despite extensive State procedures and law prohibiting the incarceration of juveniles with adults. Accordingly, if any constitutional violation occurred, it did not occur pursuant to any "policy or custom" of Respondent Prison, Respondent Board, or Respondent Warden in his official capacity. *City of Canton*, supra. For this primary reason, Prison Respondents contend that this Petition should be denied.

c. The "Consensual" Nature of Spending Clause Liability

When Congress acts under the Spending Clause, there is no question that it may set the conditions "on which it shall disburse federal money to the States." *Pennhurst*, supra, p.17. Moreover,

> . . . in return for federal funds, the States agree to comply with federally imposed conditions. The legitimacy of Congress' power to legislate under the spending power thus rests on whether the State voluntarily and knowingly accepts the terms of the "contract." . . . There can, of course, be no knowing acceptance if a State is unaware of the conditions or is unable to ascertain what is expected of it. Accordingly, if Congress intends to impose a condition on the grant of federal monies, it must do so unambiguously. *Pennhurst*, ibid. p.17.

These basic principles have direct relevance to the claim of Petitioner with respect to both Police Respondents and Prison Respondents. In the view of Prison Respondents, the holdings of the District Court " . . . that Congress intended to provide a right of action only against state and/or local agencies eligible for funding under the Act", see Memorandum of the District Court in Petition for Writ of Certiorari, A-10, is nothing more than a correct application of the principle that Spending Clause liability is "consensual" in nature and non-recipients of federal funds cannot be liable because they have not consented to anything.

At all times material in this civil action, it has been correctly assumed that Respondent Prison Board is a "non-recipient" of any federal monies disbursed under the JJDPA. Accordingly, because Respondent Prison Board has not consented to comply with any condition imposed by Congress, Respondent Prison Board contends, initially, that it cannot be liable for any alleged breach of any alleged condition, and that the holding of the District Court which was affirmed by the Court of Appeals was correct. This conclusion also holds true for Respondent Warden in his official capacity. See *Kentucky v. Graham, et al.*, 473 U.S. 159 (1985), indicating that a suit against an individual in his official capacity is equivalent to a suit against the entity for which he is an agent.

It is not an answer to this defense that the Commonwealth of Pennsylvania has consented to the conditions required for the receipt of JJDPA funds. See Petition for Writ of Certiorari, pp.20-21. At no time in this civil action has Petitioner conducted any discovery concerning the nature and scope of the "consent" of the Commonwealth

of Pennsylvania. Whether or not this "consent" encompassed local municipalities and/or local prisons who are non-recipients of JJDPA monies has never been determined. No evidentiary materials whatsoever were submitted by Petitioner on this issue in opposition to the Motions for Summary Judgment of Respondents. The issue was not, therefore, properly raised in the District Court and is not now an appropriate subject for review. See *Celotex v. Catrett*, 477 U.S. 317 (1986). In any event, given the state of the record, Respondent Prison Board contends that it must be considered a separate, governmental body under state law, see the Act of April 11, 1866, P.L. No. 562, that it has not consented to any condition under the JJDPA, and that it cannot, therefore, be liable under that Act.

Even assuming Respondent Board is an appropriate defendant, what "condition" of the JJDPA was violated by what "policy" of Respondent Board or by the Respondent Warden in his official capacity? As discussed later in this Brief, there is simply nothing in the JJDPA or accompanying Regulations, 28 C.F.R. §31.1, et seq., which in any way establishes any substantive or procedural rights with respect to a juvenile who has been committed erroneously, as an adult, to an adult facility.

Accordingly, because recognition of any such substantive or procedural right simply has not been "unambiguously" established by Congress as a "condition" to the receipt of JJDPA monies by the Commonwealth of Pennsylvania, see *Pennhurst*, supra, p.17, it follows no liability under the JJDPA can be established in this case.

Under Spending Clause legislation, "ambiguous" conditions are beyond the power of Congress to impose, *Pennhurst*, supra, and are, therefore, unenforceable. For this reason as well, Prison Respondents contend that this Petition should be denied.

d. The Nature of a Remedy in Spending Clause Litigation

Because of the absence of any substantive or procedural rights in the JJDPA concerning erroneously committed juveniles, Prison Respondents contend initially that this Act does not create a private cause of action under the facts of this case. *Pennhurst*, supra.

Even assuming the existence of some type of cause of action under §1983, this does not resolve the question of an appropriate remedy. In this case, Petitioner has assumed that, if a cause of action under the JJDPA were implied, then a damages remedy would be available under §1983. This assumption is incorrect for the question of whether a cause of action exists is "analytically distinct" from the question of what is the available remedy. *Davis v. Passman*, 442 U.S. 228, 239 (1979); *Guardians Association*, supra, p.595.

In this action, the parties agree that the JJDPA is legislation which has been enacted solely under the Spending Clause, Article I, §8, cl. 1 of the United States Constitution. Thus, conceding the availability of a private cause of action under the JJDPA, the more specific question is what remedy exists for a violation of Spending Clause legislation? In the view of Prison Respondents,

Petitioner would be entitled under §1983 solely to declaratory and injunctive relief, and not to compensatory damages.

As stated expressly by Justice White in *Guardians Association*, ibid. p.598:

> Hence, absent clear congressional intent or guidance to the contrary, the relief in private actions should be limited to declaratory and injunctive relief ordering future compliance with the declared statutory and regulatory obligations. Additional relief in the form of money or otherwise based on past unintentional violations should be withheld.

See also *Pennhurst*, supra, p.29.

Because no Spending Clause case to date has found compensatory damages available, the rulings of the District Court and Court of Appeals are correct and consistent with established precedent. The case cited by Petitioners, *Wilder v. Virginia Hospital Association*, ___ U.S. ___, 110 L.Ed.2d 455, ___ S.Ct. ___ (1990), is not support for a damages remedy. *Wilder* was a civil action under Spending Clause legislation for declaratory and injunctive relief. That the majority in *Wilder* found an implied cause of action available is simply no support whatsoever for the compensatory remedy which Petitioner seeks here. It is significant that Justice White, who was in the 5 to 4 majority in *Wilder*, has specifically rejected the availability of a compensatory remedy for unintentional violations of legislation enacted pursuant to the Spending Clause, *Guardians Association*, supra.

For this reason as well, Prison Respondents contend that the rulings of the District Court and Court of Appeals were correct and that this Petition for Certiorari need not be granted.

e. The Requirements of the JJDPA

In the view of Prison Respondents, the JJDPA deals with the intentional treatment of juvenile offenders. That is, the Act deals with what is required of a consenting State once the issue of non-age has been resolved and the individual has been determined to be a juvenile. Nowhere in either the Act or in the accompanying Regulations is the situation of an erroneous commitment considered.

Prison Respondents begin by noting the language of the statute itself. In 42 U.S.C. §5633(a)(14) it states " . . . no juvenile shall be detained or confined in any jail or lock-up for adults." 42 U.S.C. §5633(a)(12) and (13) contain similar language. This language, in the view of Prison Respondents, assumes that the issue of whether an individual is a "juvenile" has been determined and prohibits intentional detainment or confinement of a "juvenile" in an adult facility. By definition, detainment and confinement imply intentional conduct on the part of the actors. This analysis finds support in *Hendrickson v. Griggs*, 672 F.Supp. 1126, 1139 (D.C. Iowa 1987), where the State conceded that juveniles still were intentionally housed with adults.

In his Petition for Writ of Certiorari, at fn.1, Petitioner cites to the Regulations, 28 C.F.R. §§31.303(f)(5)(iv)(G) and (H) as authority for a "six-hour" holding

requirement. These particular provisions are merely "reporting requirements", however, and do not establish substantive or procedural rights. Further, the administrative definitions of "juvenile criminal-type offender", see 28 C.F.R. §§31.304(f) and (g), do not encompass a juvenile erroneously committed as an adult. In any event, Prison Respondents contend this alleged "six-hour" limitation is simply inapplicable.

Further, as also recognized in *Hendrickson*, ibid. p.1138, Congress has provided that "deminimus exceptions" can occur without a State being in violation of the Act. See 28 C.F.R. §§31.303(f)(6)(i), (ii) and (iii). By the terms of those Regulations, the erroneous commitment in this case meets the requirements of a "deminimus exception" and should not be considered a violation of the JJDPA.

Because there has been no violation of the JJDPA, Prison Respondents contend again that the rulings of the District Court and Court of Appeals were correct and that this Petition for Certiorari need not be granted.

f. The Complete Absence of Any Immunity Issue

On the question of the "personal" liability of Respondent Warden and Respondent Correctional Officer, it has not been determined to date what acts and/or omissions on their part caused the deprivation of the alleged rights of Petitioner under the JJDPA. See *Monroe v. Pape*, 365 U.S. 167 (1961). For this reason alone, no review as to their "personal" liability is warranted.

Overlooking this initial obstacle, it is contended by Respondent Warden and Respondent Correctional Officer that "good faith" immunity was plainly available. As held in *Harlow v. Fitzgerald*, supra, p.818, " . . . government officials performing discretionary functions generally are shielded from liability for civil damages insofar as their conduct does not violate clearly established statutory or constitutional rights of which a reasonable person would have known." This is an objective test and, contrary to the argument of Petitioner, necessarily involves an analysis of existing legal rights and duties.

In this case, the District Court held and the Court of Appeals affirmed that, whatever rights Petitioner had under the JJDPA at the time of his commitment, these rights certainly were not "clearly established." See Memorandum of District Court in Petition for Writ of Certiorari, A-10 and A-11. This conclusion was correct then and is correct now. An erroneously committed juvenile has no "clearly established" substantive or procedural rights under the JJDPA or accompanying Regulations which could serve as a basis for personal liability. For this reason as well, any review on this issue is not warranted.

CONCLUSION

For the reasons expressed above, Prison Respondents contend that the Petition for Writ of Certiorari should be denied. No purpose can be served by further review of the decisions of the District Court and the Court of Appeals. Rather than being contrary to existing precedent, the decisions below were consistent with, if not

compelled by, Supreme Court case law. Unfortunately for all concerned, Petitioner has simply misapprehended applicable law or has refused to accept this law as applied to the facts of this case. Prison Respondents respectfully request that this action be concluded and that this Petition for Writ of Certiorari be denied.

Respectfully submitted,

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